

### REMARKS

Claims 1-6, 12-15 and 17-35 are currently pending, with claims 1-4, 17 and 18 being independent. Claims 7-11 and 16 have been cancelled and claims 29-35 have been added. Dependent claims 29-35 recite that the insulating film containing fluoroplastics has irregularities, as recited in the application at, for example, page 4, lines 7-10. In addition, the specification has been amended in response to the Examiner's objection. No new matter has been introduced.

Claims 1-6, 12-15 and 17-28 have been provisionally rejected for obviousness-type double patenting over claims 1-22 of Yamazaki (US2004/0056589) in the view of Pichler (US2004/0187917).

With respect to independent claim 1 and its dependent claims, applicant requests reconsideration and withdrawal of this rejection because neither the claims of Yamazaki, nor Pichler, nor any proper combination of the two, describes or suggests forming an inorganic insulating film on a film containing fluoroplastics, as recited in claim 1. Recognizing that the claims of Yamazaki do not include this feature, the rejection relies on Pichler as doing so. However, Pichler does not describe or suggest forming an inorganic layer on a film containing fluoroplastics. Rather, Pichler only discloses, in paragraph [0108], that a fluorine resin may be used to laminate encapsulant layers 510, 512 as a surface protecting layer. While Pichler notes that the properties of the encapsulant layers 510, 512 may be varied to protect against exposure to water or air, these are the layers on which the fluorine resin may be formed, rather than layers formed on the fluorine resin. Pichler is silent with respect to forming additional layers on the fluorine resin. For at least this reason, applicant requests reconsideration and withdrawal of the rejection of claim 1 and its dependent claims.

Like claim 1, each of independent claims 2-4 recites forming an inorganic insulating film on a film containing fluoroplastics. Accordingly, applicant requests reconsideration and withdrawal of the rejection of claims 2-4, and their dependent claims, for the reasons discussed above.

With respect to independent claim 17 and its dependent claims, applicant requests reconsideration and withdrawal of this rejection because neither the claims of Yamazaki, nor

Pichler, nor any proper combination of the two, describes or suggests locating a film containing fluoroplastics between a TFT and an electrode, as recited in claim 17. According to claim 17, the film containing fluoroplastics is an internal element of the device. By contrast, as noted above, Pichler merely describes using fluorine resin as a surface protecting layer that may be formed on encapsulant layers at the exterior of a device. Accordingly, for at least this reason, applicant requests reconsideration and withdrawal of the rejection of claim 17 and its dependent claims.

Like claim 17, independent claim 18 recites locating a film containing fluoroplastics between a TFT and an electrode. Accordingly, applicant requests reconsideration and withdrawal of the rejection of claim 18 and its dependent claims for the reasons discussed above.

Claims 1 and 5 have been rejected as being anticipated by Pichler. Applicant requests reconsideration and withdrawal of this rejection for the reasons discussed above with respect to the double-patenting rejection of claim 1. In particular, as noted above, Pichler does not describe or suggest forming an inorganic insulating film on a film containing fluoroplastics, as recited in claim 1.

Claims 2, 12 and 14 have been rejected as being unpatentable over Yasukawa (U.S. Patent No. 6,583,440) in view of Pichler. Applicant requests reconsideration and withdrawal of this rejection because neither Yasukawa, Pichler, nor any proper combination of the two describes or suggests forming an inorganic insulating film on a film containing fluoroplastics, as recited in claim 2. Pichler's discussion of the use of fluorine resin as a surface protecting layer would not have motivated one of ordinary skill in the art to modify Yasukawa's device to make the alignment film 22 a film containing fluoroplastics, as recited in claim 2.

Moreover, even if one were to replace the alignment film 22 of Yasukawa with a film containing fluoroplastics, the resulting combination would not include an inorganic insulating film on the film containing fluoroplastics, as recited in claim 2. In particular, while the rejection indicates the Yasukawa describes an inorganic insulating film 20A formed on the alignment film 22, reference number 20A actually refers to a substrate main body (see Yasukawa at col. 31, line

63). In addition, the substrate main body 20A is not formed on the film 22. Rather, the film 22 is formed on the opposite electrode 21, which is formed on the substrate main body 20A.

Accordingly, for at least these reasons, the rejection of claim 2 and its dependent claims should be withdrawn.

Claims 3, 4, 6, 13-15, 17-22 and 25-28 have been rejected as being unpatentable over Yasukawa in view of Pichler and further in view of Seo (U.S. Patent No. 6,642,107).

With respect to claims 3 and 4, and their dependent claims, applicant requests reconsideration and withdrawal of the rejection for the reasons discussed above with respect to claim 2 and because Seo does not remedy the failure of Yasukawa and Pichler to describe or suggest forming an inorganic insulating film on a film containing fluoroplastics, as recited in claims 3 and 4.

With respect to independent claims 17 and 18, and their dependent claims, applicant requests reconsideration and withdrawal of this rejection because neither Yasukawa, Pichler, Seo, nor any proper combination of the three, describes or suggests locating a film containing fluoroplastics between a TFT and an electrode, as recited in claims 17 and 18.

Yasukawa describes locating interlayer insulating films 4 and 7 between a TFT and a pixel electrode 9a. However, as acknowledged by the rejection, Yasukawa does not describe or suggest including fluoroplastics in the films 4 and 7.

For reasons similar to those discussed above, Pichler's discussion of the use of fluorine resin as a surface protecting layer would not have motivated one of ordinary skill in the art to modify Yasukawa's device to include such a resin as the interlayer insulating film 4 or 7. Nor would Seo's mention of the use of Teflon have motivated one of ordinary skill in the art to include fluoroplastics in Yasukawa's interlayer insulating films. It is not enough that such materials could have been included; rather, the references must provide some motivation to do so.

Claim 23, which depends from claim 1, has been rejected as being unpatentable over Pichler. Applicant requests reconsideration and withdrawal of this rejection for the reasons discussed above with respect to the rejection of claim 1 over Pichter.

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Applicant submits that all claims are in condition for allowance.

Enclosed is a check in the amount of \$350.00 for excess claim fees. Please apply any other charges or credits to deposit account 06-1050.

Respectfully submitted,

Date: 5/16/05

  
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